

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re JOANN, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-10068 (CTG) (Jointly Administered) Re: D.I. 1483 & 1706 Hearing Date: September 9, 2025, at 1:00 pm ET
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**CRAFTY (AL) LLC’S AMENDED WITNESS AND EXHIBIT LIST FOR
HEARING SCHEDULED FOR SEPTEMBER 9, 2025, AT 1:00 PM (ET)**

Movant, CRAFTY (AL) LLC (“Landlord”), by and through its undersigned counsel, hereby submits this **Amended** Witness and Exhibit List for the hearing to be held on September 9, 2025, at 1:00 p.m. (ET) (the “Hearing”) with respect to the *Motion of Crafty (AL) LLC for Entry of an Order: (I) Requiring Payment of Administrative Claim for Unpaid Prorated 2025 Real Estate Taxes; (II) Compelling Payment of Claim for Removal of Improperly “Abandoned” Property as Either an Administrative Expense Claim against the Debtors and/or Liability of Purchaser; and (III) Granting Related Relief* [Dkt. No. 1483] (the “Motion”):²

Witness List

Landlord may call the following witnesses at the hearing:

1. **Elizabeth Boeckman, Analyst, W.P. Carey, Inc. Landlord anticipates making a brief proffer for the record of Ms. Boeckman’s direct testimony concerning (a) her relevant background and credentials, (b) her familiarity with the Leased Premises, and (c) her adoption of the statements contained in paragraphs 5 through 9 of the Rubenstein Declaration (as defined herein) and**

¹ The debtors in these chapter 11 cases together with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, OH 44236.

² Changes to Landlord’s original Witness and Exhibit List [Dkt. No. 1706] are highlighted in **bold text**.

the authenticity of Rubenstein Declaration, Exhibits 1 and 2 [Items 4 & 5 in Landlord's Exhibit List below].³

2. Rebuttal witnesses, as necessary.
3. Landlord reserves the right to cross-examine any witness called by any other party.

Exhibits

Landlord designates the following exhibits that may be used or introduced into the record at the Hearing:

Exhibit	Description	Disposition after Hearing
1	Declaration of Sam Rubenstein in Support of Motion of Crafty (AL) LLC for Entry of an Order: (I) Requiring Payment of Administrative Claim for Unpaid Prorated 2025 Real Estate Taxes; (II) Compelling Payment of Claim for Removal of Improperly "Abandoned" Property as Either an Administrative Expense Claim against the Debtors and/or Liability of Purchaser; and (III) Granting Related Relief [Dkt. No. 1484] (the " <u>Rubenstein Declaration</u> ")	
2.	Lease Agreement, by and between CRAFTY(AL) LLC, and Jo-Ann Stores, LLC, dated as of June 7, 2021 [Dkt. No. 1651-1]	
3.	Agency Agreement, dated as of February 26, 2025 [Dkt. No. 520-1]	
4.	D.H. Griffin Wrecking Co., Inc. Scope of Work Proposal, dated March 28, 2025 [Dkt. No. 1484-1]	
5.	Email dated 6/9/2025 from L. Blumenthal to A Lipkin [Dkt. No. 1484-2]	
6.	Lee County, Alabama 2025 Real Property Assessment for 3101 Anderson Rd, Opelika, AL	
7.	Lee County, Alabama 2025 Property Tax Notice for 3101 Anderson Rd, Opelika, AL	
8.	Any exhibit listed or presented by any other party.	
9.	Any document or pleading filed in the above-captioned cases.	

³ Following the filing of Landlord's initial Witness and Exhibit List on September 5, 2025 [Dkt. No. 1706], counsel for Landlord learned that Landlord original witness, Mr. Sam Rubenstein, had an unavoidable conflict that prevented him from traveling from New York to Delaware for this Hearing.

10.	Any exhibit for impeachment or rebuttal purposes.	
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Reservation of Rights

Landlord reserves (a) the right to amend and/or supplement this **Amended** Witness and Exhibit List at any time prior to the Hearing and add witnesses and/or exhibits, as applicable, and (b) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing **Amended** Witness and Exhibit List as appropriate. Landlord also reserves the right to rely upon and use as evidence (a) exhibits included on the exhibit list of any other parties in interest, and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: September 8, 2025
Wilmington, Delaware

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